UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
V.)	Crim. No. 16-cr-40036-TSH
)	
JENIFFER TOLEDO, and)	
AMINA YOUNG,)	
)	
Defendants.)	

JOINT MEMORANDUM PURSUANT TO LOCAL RULE 116.5(c)

The United States of America and defendants Jennifer Toledo and Amina Young (collectively "the defendants"), through their respective counsel, hereby submit this joint memorandum addressing Local Rule 116.5(c) in advance of the final status conference scheduled for March 9, 2017.

I. Local Rule 116.5(c)(1)

Defendant Jennifer Toledo requests that her matter be transferred to the District Court for a Rule 11 hearing.

II. Local Rule 116.5(c)(2)

On December 8, 2016 and December 15, 2016, the government produced automatic discovery as required by Fed. R. Crim. P. 16 and Rules 116.1(c) and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts. Defendant Amina Young filed a motion for additional discovery on March 6, 2017. The government is in the process of responding to that discovery motion pursuant to Local Rule 116.3(i).

Respectfully	submitted,
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JENNIFER TOLEDO,

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/s/ Leonardo Angiulo

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/s/ Joan Fund

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Dated: March 8, 2017

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Greg A. Friedholm
Greg A. Friedholm
Assistant U.S. Attorney

Date: March 8, 2017